

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

MARK HOFFMAN, on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

HEARING HELP EXPRESS, INC.,
TRIANGULAR MEDIA CORP.,
LEADCREATIONS.COM, LLC and LEWIS
LURIE,

Defendants.

NO. 3:19-cv-05960-MJP

**STIPULATION AND [PROPOSED]
ORDER SETTING TRIAL DATE AND
RELATED DEADLINES**

Note on Motion Calendar: 9/17/20

I. STIPULATION

Plaintiff Mark Hoffman and Defendants Hearing Help Express, Inc. and Lewis Lurie
stipulate as follows:

EVENT	DATE
JURY TRIAL DATE	November 1, 2021
Deadline for joining additional parties	December 31, 2020
Reports from expert witness under FRCP 26(a)(2) due	January 15, 2021
Deadline to move for class certification	February 25, 2021

EVENT	DATE
All motions related to discovery must be filed by and noted on the motion calendar on the third Friday thereafter (see CR7(d))	May 6, 2021
Discovery completed by	April 30, 2021
All dispositive motions must be filed by and noted on the motion calendar on the fourth Friday thereafter (see CR7(d)) Counsel are cognizant of the requirement to provide courtesy copies of any motions with exhibits or other attachments exceeding 50 pages.	May 27, 2021
All motions in limine must be filed by and noted on the motion calendar no earlier than the third Friday thereafter and no later than the Friday before the pretrial conference	September 27, 2021
Agreed pretrial order due	October 19, 2021
Trial briefs, proposed voir dire questions, and proposed jury instructions	October 19, 2021
Pretrial conference	October 21, 2021 at 01:30 PM
Length of Jury Trial	5 – 7 days

COOPERATION:

As required by CR 37(a), counsel will resolve all discovery matters by agreement, if possible. Counsel shall also cooperate in preparing the final pretrial order in the format required by CR 16.1, except as set forth below.

EXHIBITS:

The original and one copy of the trial exhibits are to be delivered to chambers four days before the trial date. Each exhibit shall be clearly marked. Exhibit tags are available in the Clerk's Office. Pursuant to this Court's practices, plaintiff's exhibits shall be numbered consecutively beginning with 1 and defendants' exhibits shall be numbered consecutively beginning with the next number series not used by plaintiff. Duplicate documents shall not be

1 listed twice: once a party has identified an exhibit in the pretrial order, any party may use it.
2 Each set of exhibits shall be submitted in individual file folders with appropriately numbered
3 tabs.

4 **SETTLEMENT:**

5 Should this case settle, counsel shall notify Rhonda Miller as soon as possible at (206)
6 370-8518.

7 RESPECTFULLY SUBMITTED AND DATED this 17th day of September, 2020.

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17
18 **II. [PROPOSED] ORDER**

19 IT IS SO ORDERED.

20 Dated this _____ day of _____, 2020.

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UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Adrienne D. McEntee, hereby certify that on September 17, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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9 DATED this 17th day of September, 2020.

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